## **Emissions Unit Programme Registry Attestation**

#### PART A. Applicability and Instructions

- **1.** Relevance and definitions:
  - **1.1.** These terms are relevant to emissions unit programmes and their designated registries:
    - **1.1.1.***CORSIA Eligible Emissions Unit Programme:* emissions unit programme approved by the ICAO Council as eligible to supply emissions units under the CORSIA.
    - **1.1.2.***CORSIA Eligible Emissions Unit Programme registry:* registry designated by a CORSIA Eligible Emissions Unit Programme to provide its registry services.
    - **1.1.3.** *Material change:* any update to the procedures of an emissions unit programme or its designated registry that would alter the functions that are addressed in the Emissions Unit Criteria (EUC), related guidelines, or the contents of this attestation. This includes changes that would alter responses to questions in the application form that the programme has submitted to the ICAO Secretariat or contradict the confirmation of the registry's adherence to the requirements contained in this attestation.
    - **1.1.4.** *Cancel:* the permanent removal and single use of a CORSIA Eligible Emissions Unit within a CORSIA Eligible Emissions Unit Programme designated registry such that the same emissions unit may not be used more than once. This is sometimes also referred to as "retirement", "cancelled", "cancelling" or "cancellation".
    - **1.1.5.** *Business day:* defined by the CORSIA Eligible Emissions Unit Programme registry when responding to formal instruction from a duly authorized representative of the owner of an account capable of holding and cancelling CORSIA Eligible Emission Units.
  - **1.2.** References to "Annex 16, Volume IV" throughout this document refer to Annex 16 to the Convention on International Civil Aviation *Environmental Protection*, Volume IV *Carbon Offsetting and reduction Scheme for International Aviation (CORSIA)*, containing the Standards and Recommended Practices (SARPs) for CORSIA implementation.
- **2.** Programme registry relationship:
  - **2.1.** The ICAO Council's Technical Advisory Body (TAB) conducts its assessment of emissions unit programme eligibility including an assessment of the programme's provisions and procedures governing the programme registry, as represented by the programme. The ICAO Council determines CORSIA eligible emissions units upon recommendations by TAB and consistent with the EUC. The programme registry is not separately or independently considered throughout this process.
  - **2.2.** The provision of registry services under the CORSIA by a CORSIA Eligible Emissions Unit Programme registry is fully subject to the terms, conditions and limitations to the programme's scope of eligibility. Such terms include, *inter alia*, the programme's commitment to administer any and all provisions and procedures governing the programme

- registry in the manner represented by the programme in the application form and additional information provided to TAB during the assessment process.
- **2.3.** A CORSIA Eligible Emissions Unit Programme registry can provide registry services to aeroplane operators prior to the programme's and programme registry's demonstration of the registry's consistency with the registry requirements contained in this attestation. However, the programme registry can only claim to support and can only provide for aeroplane operators to fulfill the provisions in Annex 16, Volume IV involving emissions unit cancellation-, reporting-, and verification-related actions after its consistency with the registry requirements contained in this attestation is demonstrated, and the signed attestation is published on the CORSIA website in addition to the ICAO document "CORSIA Eligible Emissions Units".
- **3.** Submitting an "Emissions Unit Programme Registry Attestation":
  - **3.1.** Both the administrator or authorized representative ("Programme Representative") of an emissions unit programme ("Programme"), and the administrator or authorized representative ("Registry Representative") of the registry designated by the Programme ("Programme Registry") will review and attest to their acceptance (as signed in Section 8 of this attestation) of all terms contained herein.
  - **3.2.** The Programme will electronically submit to the ICAO Secretariat a unique, dual-signed attestation for each and every Programme Registry that will provide its registry services to the Programme under the CORSIA:
    - **3.2.1.**If the Programme is determined to be eligible by a decision of the ICAO Council taken in 2020, the Programme will submit the signed attestation(s) to the ICAO Secretariat no later than one year after the Programme is determined to be eligible by the ICAO Council.
    - **3.2.2.**From 2021, the Programme should submit the signed attestation(s) to the ICAO Secretariat at the time of applying for assessment by the TAB. If the Programme is determined to be eligible by a decision of the ICAO Council after 31 December 2020, the Programme will submit the signed attestation(s) to the ICAO Secretariat no later than 180 days after the Programme is determined to be eligible by the ICAO Council.
  - **3.3.** As soon as possible upon receiving a signed attestation from the Programme, the ICAO Secretariat will:
    - **3.3.1.** Forward the signed attestation to the TAB; and
    - **3.3.2.**If the Programme is determined to be eligible by a decision of the ICAO Council, publicly post the signed attestation on the CORSIA website in addition to the ICAO document "CORSIA Eligible Emissions Units".

#### **PART B: Emissions Unit Programme Registry Attestation**

- **4. Programme application materials**. As the Registry Representative, I certify items 4.1 to 4.4:
  - **4.1.** I have read and fully comprehend the following information:
    - **4.1.1.** The instructions and terms of this attestation;
    - **4.1.2.**The contents of the ICAO document "CORSIA Emissions Unit Eligibility Criteria";
    - **4.1.3.**The contents of the most recent version of the application form that the Programme has provided to the ICAO Secretariat; and
    - **4.1.4.** The terms, conditions and limitations to the Programme's scope of eligibility and further action(s) requested to the Programme by the ICAO Council, as presented to the Programme upon relevant decision of the ICAO Council on the Programme's eligibility<sup>1</sup>.
  - **4.2.** The Programme's representation of its provisions and procedures governing the Programme Registry, and of Programme Registry functionality, as contained in the most recent version of the application form that the Programme has provided to the ICAO Secretariat, is true, accurate, and complete, to the best of my knowledge;
  - **4.3.** The Programme Registry will notify the Programme of any material changes to the Programme Registry, to enable the Programme to maintain consistency with relevant criteria and guidelines throughout its assessment by TAB and up to an eligibility decision by the ICAO Council; and, if applicable, continuing on from the effective date of an affirmative eligibility decision by the ICAO Council, the Programme Registry will notify the Programme of any material changes to the Programme Registry, such that the Programme can maintain consistency with relevant criteria and guidelines;
  - **4.4.** The Programme Registry and Registry Representative will not publicly disseminate, communicate, or otherwise disclose the nature, content, or status of communications between the Programme, the Programme Registry, and/or the ICAO Secretariat, related to the status of the Programme's provision of programme and registry services under the CORSIA, unless the Programme has received prior notice from the ICAO Secretariat that such information has been and/or can be publicly disclosed.
- **5. Scope of Programme responsibilities under the CORSIA**. As the Registry Representative, I acknowledge items 5.1 to 5.2:
  - **5.1.** The scope of the Programme assessment by the TAB, through which the TAB will develop recommendations on the list of eligible emissions unit programmes (and potentially project types) for use under the CORSIA, which will then be considered by the ICAO Council for an eligibility decision, including the Programme's responsibilities throughout this process; and

<sup>&</sup>lt;sup>1</sup> Only applicable when the Programme submits the signed "*Emissions Unit Programme Registry Attestation*" to the ICAO Secretariat after the Programme is determined to be eligible by a decision of the ICAO Council.

- **5.2.** The scope and limitations of the ICAO Secretariat's responsibilities related to the assessment process.
- **6. Programme Registry relationship**. As the Registry Representative, I understand and accept items 6.1 to 6.2:
  - **6.1.** The Programme Registry's provision of registry services under the CORSIA is subject to the terms, conditions and limitations to the Programme's scope of eligibility, as presented to the Programme upon relevant decision of the ICAO Council on the Programme's eligibility; and
  - **6.2.** Only after the Programme and the ICAO Secretariat have completed all steps in Part A, Section 3 of this attestation, can the Programme Registry facilitate and identify emissions unit cancellations specifically for CORSIA use, and support any related reporting and verification activities. The Programme Registry will not promote itself as being capable of providing registry services for the described purpose until such time.
- **7. Scope of Programme Registry responsibilities under the CORSIA**. As the Registry Representative, I certify items 7.1 to 7.11:
  - **7.1.** The Programme Registry is capable of fully meeting the objectives of any and all Programme provisions and procedures related to the Programme Registry that the Programme is required to have in place:
    - **7.1.1.**In the manner represented by the Programme in the application form that the Programme has provided to the ICAO Secretariat; and
    - **7.1.2.** As acknowledged by the Programme in the signed "Programme acceptance to terms of eligibility for inclusion in the ICAO document "CORSIA Eligible Emissions Units".
  - **7.2.** The Programme Registry will not deny a CORSIA participant's request for a registry account solely on the basis of the country in which the requestor is headquartered or based;
  - **7.3.** The Programme Registry will, upon request of the CORSIA participant account holder or participant's designee, designate the participant's cancellation of emissions units for the purpose of reconciling offsetting requirements under the CORSIA, including by compliance cycle;
  - 7.4. The Programme Registry will, within 1 3 business days of receipt of formal instruction from a duly authorized representative of the owner of an account capable of holding and cancelling CORSIA Eligible Emission Units within the registry, and barring system downtime that is scheduled in advance or beyond the control of the registry administrator, make visible on the Programme Registry's public website the account owners cancellations of CORSIA Eligible Emission Units as instructed. Such cancellation information will include all fields that are specified for this purpose in Annex 16, Volume IV;

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<sup>&</sup>lt;sup>2</sup> Only applicable when the Programme submits the signed "Emissions Unit Programme Registry Attestation" to the ICAO Secretariat after the Programme is determined to be eligible by a decision of the ICAO Council.

- **7.5.** The Programme Registry will, upon request of the CORSIA participant account holder or participant's designee, generate report(s) containing the information specified for this purpose in Annex 16, Volume IV;
- 7.6. The Programme Registry will maintain robust security practices that ensure the integrity of, and authenticated and secure access to, the registry data of CORSIA participant account holders or participants' designees, and transaction events carried out by a user; and disclose documentation of such practices upon request. The Programme Registry will utilize appropriate method(s) to authenticate the identity of each user accessing an account; grant each user access only to the information and functions that a user is entitled to; and utilize appropriate method(s) to ensure that each event initiated by a user (i.e. transfer of units between accounts; cancellation/retirement of a unit, update of data, etc.) is an intentional transaction event confirmed by the user. Such security features will meet and be periodically updated in accordance with industry best practice;
- 7.7. The Programme Registry will, upon identifying any breach of Programme Registry data security or integrity that affects a CORSIA participant account holder or participant's designee, notify the CORSIA participant account holder or their designee, and notify the Programme, which will inform and engage with the ICAO Secretariat on the matter in the same manner as required for material deviations from the Programme's application form;
- **7.8.** The Programme Registry will ensure the irreversibility of emissions unit cancellations and the designation of the purpose of emissions units cancellations, as per the requirements contained in Annex 16, Volume IV (Part II, Chapter 4). Without prejudice to the aforementioned, such requirement would not prevent a Programme Registry from utilizing secure, time-bound and auditable methods for correcting unintentional user-entry errors;
- **7.9.** The Programme Registry will ensure that all cancellation information on its website is presented in a user-friendly format; is available at no cost and with no credentials required; is capable of being searched based on data fields; and can be downloaded in a machine-readable format, e.g., .xlsx;
- **7.10.** The Programme Registry will retain documents and data relevant to CORSIA Eligible Emissions Units and cancellations on an ongoing basis and for at least three years beyond the end date of the latest compliance period in which the emissions unit programme is determined to be eligible; and consistent with the Programme's long-term planning, including plans for possible dissolution;
- **7.11.** The Programme Registry will append a document to the end of the signed attestation describing how it will ensure its ability to implement the requirements of this document. This will include references to existing registry functionalities that already meet the requirements of this document and/or description of business practices and procedures that ensure the Programme Registry's ability to implement the requirements in this document.
- **8.** Accuracy and completeness of information. The signatures below certify that the information provided is true and correct in all material respects on the date as of which such information is dated or certified and does not omit any material fact necessary in order to make such information not misleading. Representatives are duly authorized for official correspondence on behalf of their organization.

Naovi Sickael	Naovi Sickned
Programme Representative Signature	Registry Representative Signature
Naomi Swickard Programme Representative Name	Naomi Swickard Registry Representative Name
Verified Carbon Standard Programme Name	Verra Registry Registry Name
12 March 2021 Date	12 March 2021 Date

Instructions for Registry Representative: Please append a document on the next page of this attestation describing how your Registry will ensure its ability to implement the requirements of this document, including references to existing registry functionalities that meet the requirements of this document and/or description of business practices and procedures that describe the Programme Registry's implementation of the requirements of this document.

#### ATTACHMENT A: PROGRAMME REGISTRY ATTESTATION DISCLOSURE FORM

#### PART 1: INSTRUCTIONS FOR REGISTRY REPRESENTATIVE

The following information request corresponds to the registry representative's certification of its adherence to items 7.1 to 7.10 of the *Emissions Unit Programme Registry Attestation* "Scope of Programme Registry responsibilities under the CORSIA".

In accordance with item 7.11 of the *Emissions Unit Programme Registry Attestation*, registry administrators are to complete and append this form to the signed *Attestation* describing how the Registry will ensure its ability to implement the requirements of the *Attestation*. This includes references to existing registry functionalities that already meet the requirements of the *Attestation* and/or descriptions of business practices and procedures that ensure the Programme Registry's ability to implement the requirements in the *Attestation*.

For further guidance regarding the format and approaches for providing summary information and evidence of system functionalities and/or procedures in this form, refer to instructions for "**Form Completion**" in the *Application Form for Emissions Unit Programmes*<sup>3</sup>.

#### PART 2: REGISTRY AND REGISTRY REPRESENTATIVE INFORMATION

[A. – C. Programme, Administrator, and Representative information from Part 1 of Application Form]

[D. – E. Programme Registry and Administering Organization Name and contact; Programme Registry Administrator Name and contact information (may duplicate information from A. – C.)]

#### PART 3: EVIDENCE OF ADHERENCE TO SCOPE OF REGISTRY RESPONSIBILITIES

Does the Programme Registry fully meet the objectives of any and all Programme provisions and procedures related to the Programme Registry that the Programme is required to have in place in the manner represented by the Programme in the application form that the Programme has provided to the ICAO Secretariat and, if applicable<sup>4</sup>, as acknowledged by the Programme in the signed "Programme acceptance to terms of eligibility for inclusion in the ICAO document 'CORSIA Eligible Emissions Units'"?

YES

7.1

Describe how the Registry ensures its ability to implement these provisions:

- 1. The VCS Program Registry (Verra Registry) has the capability to designate the ICAO eligibility status of particular units. The VCUs can be labeled with the "CORSIA" certification if they meet the requirements. Examples of labeled VCUs can be found in the <u>VCU section</u> of the publicly available <u>Verra Project Database</u>. The column "Additional Certifications" indicates whether each VCU issuance is labeled with an additional certification. A CORSIA label is available in the registry system such that one can search for all ICAO/CORSIA eligible units.
- 2. The Verra Registry identifies and facilitates the tracking and transfer of unit ownership/holding from issuance to retirement.
- 3. The Verra Registry identifies unit status, including retirement, and issuance status.

<sup>&</sup>lt;sup>3</sup> https://www.icao.int/environmental-protection/CORSIA/Pages/TAB.aspx

<sup>&</sup>lt;sup>4</sup> Only applicable when the Programme submits the signed "*Emissions Unit Programme Registry Attestation*" to the ICAO Secretariat after the Programme is determined to be eligible by a decision of the ICAO Council.

- 4. The <u>VCU section</u> of the <u>Verra Project Database</u> contains a column titled "Credits Quantity Issued" with hyperlinked values of issuance and retirement / cancellation quantities. Selecting any of the hyperlinks will navigate the user to the records' respective "VCU Details Report", where the field "Status of VCUs" is publicly available.
- 5. The Verra Registry assigns unique serial numbers to issued units. These serial numbers are available on the Verra Project Database in the VCU section.
- 6. The Verra Registry sets out the serial number, country and sector of origin, and vintage year for every unit issued. Specifically, the "VCU Details Report" pages of the Verra Project Database identify the serial number of every unit issued under the VCS Program.
- 7. The VCU serial number format is publicly available on the Verra Project Database webpage via the VCU Serial Number Format document. The VCU serial number format includes the ISO 3166 country codes, numeric codes corresponding to the sectoral scope number (publicly available on the Verra webpage VCS Sectoral Scopes) and the vintage start and end dates of each VCU.
- 8. Please note that the terminology used in the Verra Registry is "retirement" or "retired".

In the field below, provide link(s) to any web-based evidence of existing registry functionalities and/or of documents demonstrating business practices and procedures for the Programme Registry's implementation of these provisions. Alternatively, or in addition, confirm that such evidence is included as an attachment to this *Emissions Unit Programme Registry Attestation*.

The Verra Registry "User Guide" is attached with this submission. Also provided is the release note for V2 of the Verra Registry which lists the implementation of the "CORSIA" label. V2 was released on 15 October 2020. These documents are also available on the Verra website <a href="https://example.com/here-exa

Will the Programme Registry ensure that a CORSIA participant's request for a registry account will not be denied solely on the basis of the country in which the requestor is headquartered or based?

YES

Describe how the Registry ensures its ability to implement these provisions:

Verra does not have any written or unwritten restrictions on the location of an entity that requests a Verra Registry account.

7.2

In the field below, provide link(s) to any web-based evidence of existing registry functionalities and/or of documents demonstrating business practices and procedures for the Programme Registry's implementation of these provisions. Alternatively, or in addition, confirm that such evidence is included as an attachment to this *Emissions Unit Programme Registry Attestation*.

Verra does not have any written or unwritten restrictions on the location of an entity that requests a Verra Registry account.

Will the Programme Registry, upon request of the CORSIA participant account holder or participant's designee, designate the participant's cancellation of emissions units for the purpose of reconciling offsetting requirements under the CORSIA, including by compliance cycle?

YES

7.3

Describe how the Registry ensures its ability to implement these provisions:

Retirements of CORSIA labelled VCUs are immediate in the Verra Registry and are immediately reflected in the Verra Project Database. The retirement record includes a "retirement reason" which will specify retirement for CORSIA. The retirement record also contains the retirement date and credit vintage.

In the field below, provide link(s) to any web-based evidence of existing registry functionalities and/or of documents demonstrating business practices and procedures for the Programme

Registry's implementation of these provisions. Alternatively, or in addition, confirm that such evidence is included as an attachment to this *Emissions Unit Programme Registry Attestation*.

Retirements and cancelations of CORSIA labelled VCUs are immediate in the Verra Registry and are immediately reflected in the <u>Verra Project Database</u>. The retirement record includes a "retirement reason" which will reflect that the credits have been retired for CORSIA.

a. Will the Programme Registry, within 1 – 3 business days of receipt of formal instruction from a duly authorized representative of the owner of an account capable of holding and cancelling CORSIA Eligible Emission Units within the registry, and barring system downtime that is scheduled in advance or beyond the control of the registry administrator, make visible on the Programme Registry's public website the account owner's cancellations of CORSIA Eligible Emission Units as instructed.

b. Will such cancellation information (row a) include all fields that are specified for this purpose in Annex 16, Volume  $IV^5$ ?

YES

7.4

Describe how the Registry ensures its ability to implement these provisions:

Retirements of CORSIA labelled VCUs are immediate in the Verra Registry and are immediately reflected in the Verra Project Database. The fields that are provided can be seen here: <a href="https://registry.verra.org/app/search/VCS/VCUs">https://registry.verra.org/app/search/VCS/VCUs</a>. The database includes an "Additional Certification" field which will display the CORSIA label.

In the field below, provide link(s) to any web-based evidence of existing registry functionalities and/or of documents demonstrating business practices and procedures for the Programme Registry's implementation of these provisions. Alternatively, or in addition, confirm that such evidence is included as an attachment to this *Emissions Unit Programme Registry Attestation*.

https://registry.verra.org/app/search/VCS/VCUs

Will the Programme Registry, upon request of the CORSIA participant account holder or participant's designee, generate report(s) containing the information specified for this purpose in Annex 16, Volume IV<sup>6</sup>?

YES

Describe how the Registry ensures its ability to implement these provisions:

The Verra Registry and the Verra Project Database both provide the user with the ability to generate reports on issued and retired credits with the CORSIA label.

7.5

In the field below, provide link(s) to any web-based evidence of existing registry functionalities and/or of documents demonstrating business practices and procedures for the Programme Registry's implementation of these provisions. Alternatively, or in addition, confirm that such evidence is included as an attachment to this *Emissions Unit Programme Registry Attestation*.

https://registry.verra.org/app/search/VCS/VCUs

https://registry.verra.org/mymodule/mypage.asp?p=login

<sup>&</sup>lt;sup>5</sup> [Reference to SARPs provisions containing specific information / fields to reflect in registry]

<sup>&</sup>lt;sup>6</sup> [Reference to SARPs provisions containing specific information / fields to reflect in registry]

7.6	a. Does the Programme Registry maintain robust security practices that ensure the integrity of, and authenticated and secure access to, the registry data of CORSIA participant account holders or participants' designees, and transaction events carried out by a user?	YES	
	b. Does the Programme Registry disclose documentation of such practices (row a) upon request?	YES	
	c. Does the Programme Registry utilize appropriate method(s) to authenticate the identity of each user accessing an account?	YES	
	d. Does the Programme Registry grant each user access only to the information and functions that a user is entitled to?	YES	
	e. Does the Programme Registry utilize appropriate method(s) to ensure that each event initiated by a user (i.e. transfer of units between accounts; cancellation/retirement of a unit, update of data, etc.) is an intentional transaction event confirmed by the user?	YES	
	f. Do such security features (rows $a-e$ ) meet and undergo periodic updates in accordance with industry best practice?	YES	
	Describe how the Registry ensures its ability to implement each provision in rows a – f:		
	The Verra Registry is subject to regular Service Organization Control 3 (Soc 3) audits. These audits address the questions in 7.6 a-f.		
	In the field below, provide link(s) to any web-based evidence of existing registry functionalities and/or of documents demonstrating business practices and procedures for the Programme Registry's implementation of these provisions. Alternatively, or in addition, confirm that such evidence is included as an attachment to this <i>Emissions Unit Programme Registry Attestation</i> .		

a. Will the Programme Registry, upon identifying any breach of Programme Registry data security or integrity that affects a CORSIA participant account holder or participant's designee, notify the CORSIA participant account holder or their designee?	YES
b. Will the Programme Registry, upon identifying any breach of Programme Registry data security or integrity that affects a CORSIA participant account holder or participant's designee, notify the Programme, which will inform and engage with the ICAO Secretariat on the matter in the same manner as required for material deviations from the Programme's application form?	YES

The most recent SOC 3 report can be provided upon request.

7

Describe how the Registry ensures its ability to implement each provision in rows a and b:

Should Verra become aware of a breach of user data security or integrity, we will notify all account holders and the ICAO Secretariat via email.

In the field below, provide link(s) to any web-based evidence of existing registry functionalities and/or of documents demonstrating business practices and procedures for the Programme Registry's implementation of these provisions. Alternatively, or in addition, confirm that such evidence is included as an attachment to this Emissions Unit Programme Registry Attestation.

Should Verra become aware of a breach of user data security or integrity, we will notify all account holders and the ICAO Secretariat via email.

Does the Programme Registry ensure the irreversibility of emissions unit cancellations and the designation of the purpose of emissions units cancellations, as per the requirements contained in Annex 16, Volume IV (Part II, Chapter 4)<sup>7,8</sup>?

YES

Describe how the Registry ensures its ability to implement these provisions:

7.8

Verra Registry users are unable to reverse a credit retirement through the user interface. Per the ICAO guidelines, the Verra Registry Administration may, where a valid request is received, reverse a retirement on behalf of an account holder.

In the field below, provide link(s) to any web-based evidence of existing registry functionalities and/or of documents demonstrating business practices and procedures for the Programme Registry's implementation of these provisions. Alternatively, or in addition, confirm that such evidence is included as an attachment to this *Emissions Unit Programme Registry Attestation*.

The Verra Registry does not have functionality that allows it's users to reverse a credit retirement.

	a. Does the Programme Registry ensure that all cancellation information on its website is presented in a user-friendly format?	YES
	b. Does the Programme Registry ensure that all cancellation information on its website is available at no cost and with no credentials required?	YES
	c. Does the Programme Registry ensure that all cancellation information on its website is capable of being searched based on data fields?	YES
7.9	d. Does the Programme Registry ensure that all cancellation information on its website can be downloaded in a machine-readable format, e.g., .xlsx?	YES

Describe how the Registry ensures its ability to implement each provision in rows a - d:

The requirements listed in a-d are available in the Verra Project Database.

In the field below, provide link(s) to any web-based evidence of existing registry functionalities and/or of documents demonstrating business practices and procedures for the Programme Registry's implementation of these provisions. Alternatively, or in addition, confirm that such evidence is included as an attachment to this *Emissions Unit Programme Registry Attestation*.

https://registry.verra.org/app/search/VCS/VCUs

7.10	a. Will the Programme Registry retain documents and data relevant to CORSIA Eligible			
	Emissions Units and cancellations on an ongoing basis and for at least three years			

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<sup>&</sup>lt;sup>7</sup> Sections 4.2.2 (b)

<sup>8</sup> Without prejudice to the aforementioned, such requirement would not prevent a Programme Registry from utilizing secure, time-bound and auditable methods for correcting unintentional user-entry errors.

beyond the end date of the latest compliance period in which the emissions unit programme is determined to be eligible?	
b. Will the Programme Registry retain documents and data relevant to CORSIA Eligible Emissions Units and cancellations consistent with the Programme's long-term planning, including plans for possible dissolution?	YES

Describe how the Registry ensures its ability to implement each provision in rows a and b:

Verra has a document and data storage policy. See Section 11 of the attached Accounting Manual. We will update that policy in 2021, to include among other things registry data.

In the field below, provide link(s) to any web-based evidence of existing registry functionalities and/or of documents demonstrating business practices and procedures for the Programme Registry's implementation of these provisions. Alternatively, or in addition, confirm that such evidence is included as an attachment to this *Emissions Unit Programme Registry Attestation*.

Verra has a document and data storage policy. See Section 11 of the attached Accounting Manual. We will update that policy in 2021, to include among other things registry data.

# VERRA REGISTRY USER GUIDE VERRA

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# 1 INTRODUCTION

The Verra Registry User Guide is a system functionality reference document. This guide contains topics that will be edited and expanded on an ongoing basis. If there are any questions about the content of this document or if you have questions not covered in this guide, contact the Verra Registry Administrator at <a href="mailto:registy@verra.org">registy@verra.org</a>.

#### 1.1 Version

This document will be updated from time-to-time and readers shall ensure that they are using the most current version of the document.

#### 1.2 Language

The operating language of the Verra Registry is English.

## 1.3 Support and Hours of Operation

Registry support hours are from 8 AM to 6 PM EST. The Registry Administrator team can be contacted at <a href="mailto:registry@verra.org">registry@verra.org</a>.

## 2 ACCOUNT REGISTRATION

#### 2.1 Introduction

Any person or entity wanting to participate in the Verra Registry must establish an account. Registrants will provide basic account registration information, such as Account Holder name, address and contact information, to the Verra Registry Administrator <u>via a secure webpage</u>, and will need to agree to the Terms of Use. The Verra Registry Administrator will review the account application and may request more information before approving or rejecting the application.

An account will remain active until terminated. Termination can be initiated by the Account Holder by notifying the Verra Registry Administrator. Accounts can also be terminated if an Account Holder fails to pay the Verra Registry fees or is otherwise in default under the <u>Terms of Use</u>. The Terms of Use describe these issues, as well as additional important terms, and should be read and understood by anyone applying to be an Account Holder.

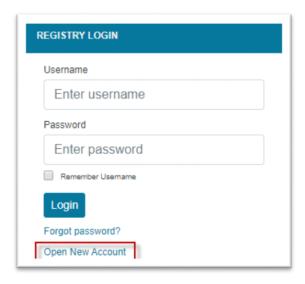
### 2.2 Opening an Account



Review the Verra Program Guides and Fee Schedules. This information is available on the Verra website at <a href="https://www.verra.org">www.verra.org</a>:

- VCS Program Guide
- VCS Program Fee Schedule
- Climate, Community & Biodiversity Standards
- CCB Program Fee Schedule
- SD VISta Program Guide
- SD VISta Program Fee Schedule
- California Offset Project Registry

- 2.2.1 Registry Account Types determine how an organization interacts in the registry.
  - General Account. This account type allows the Account Holder to register projects, issue credits, transfer or export credits to counterparties, received transfers of credits from counterparties and retire VCUs on its behalf. A General Account Holder can also retire credits on behalf of third parties.
  - <u>Project Proponent.</u> This account type allows the Account Holder to register projects, issue credits, transfer or export credits to counterparties and retire credits on its behalf. This account type cannot receive credit transfers nor hold or retire credits on behalf of Third Parties. This account type is recommended for most project developers. If, in addition to registering projects, an Account Holder also wishes to buy credits, a General Account is required.
  - Retail Aggregation. This account type allows the Account Holder to receive transfers of credits from counterparties and retire on behalf of third parties. Any credits transferred to the account have to be retired within a certain period after delivery to the account, the maximum hold period being established by the Registry Administrator. If the Account Holder does not retire VCUs within the prescribed timeline, the Registry Administrator will do so. A Retail Aggregator Account Holder cannot transfer credits to counterparties. This account type is recommended for organizations that buy credits to retire on behalf of third parties.
  - End User. This account type allows the Account Holder to receive transfers of credits from counterparties for immediate retirement only. Retirements can only be on behalf of the Account Holder. An End-User Account Holder cannot transfer or export credits to counterparties or hold Active credits in its account. This account type is recommended for organizations that buy credits to offset their emissions.
- 2.2.2 Go to <a href="https://registry.verra.org">https://registry.verra.org</a> and select the "Open New Account" link just underneath the Login button. From this screen, select "Open New Account". A pop-up window will appear with a checklist describing the steps required to register for an account. Select the appropriate Account Type and click the "Continue Registration" button.

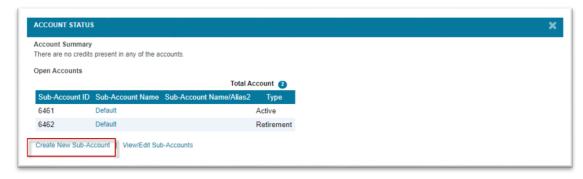


- 2.2.3 Read and agree to the Verra Registry <u>Terms of Use</u> (this is your next step after clicking "Continue Registration"). Acceptance of the Terms of Use must be indicated by reviewing all terms, checking each section, and lastly, agreeing to the Terms of Use by pressing the "I Agree" button.
- 2.2.4 Upon accepting the Terms of Use, the next screen shows the online New Account Application Form. You will need to complete all required fields that are noted by an asterisk (\*). You must designate at least one person (but may designate two) who would receive e-mails regarding the status of invoices and payments. Upon completing the New Account Application form and clicking Submit, you will receive an email notification to confirm your account request. This confirmation must occur before the Registry Administrator is notified of your pending account.
- 2.2.5 The Registry Administrator reviews the new account application once submitted. All new accounts are subject to a "Know Your Customer" (KYC) review following the submittal of the registration form. The Registry Administrator will send the account applicant a list of documents that must be submitted for the Know Your Customer review. The review takes 2 to 5 working days to complete. Email notification of account approval will be sent to the designated Account Manager email address provided in the new account application form. Once approved, Account Holders may begin using all functions of the system available to their type of account.

# 3 SETTING UP LOGINS & SUB ACCOUNTS

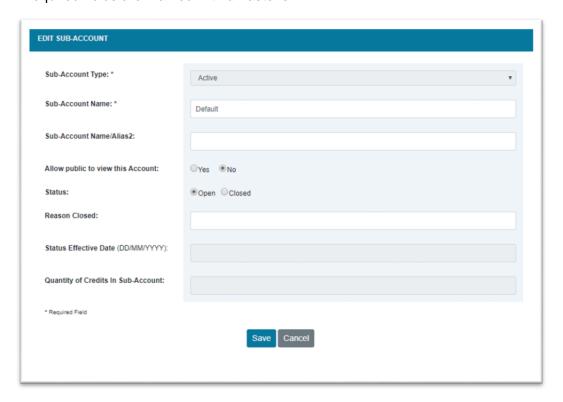
### 3.1 Opening and Editing Sub-Accounts

3.1.1 Default sub-accounts are automatically created based on the privileges of your account type. All account types except for the "Verifier" account type will receive one Active and one Retirement sub-account. Additional sub-accounts can be created from the "Create New Sub-Account" section of the Account Status module.



3.1.2 Select the sub-account type "Active" or "Retirement" and complete the required fields. Fields marked with an asterisk are required for completion. A sub-account account name must be unique.

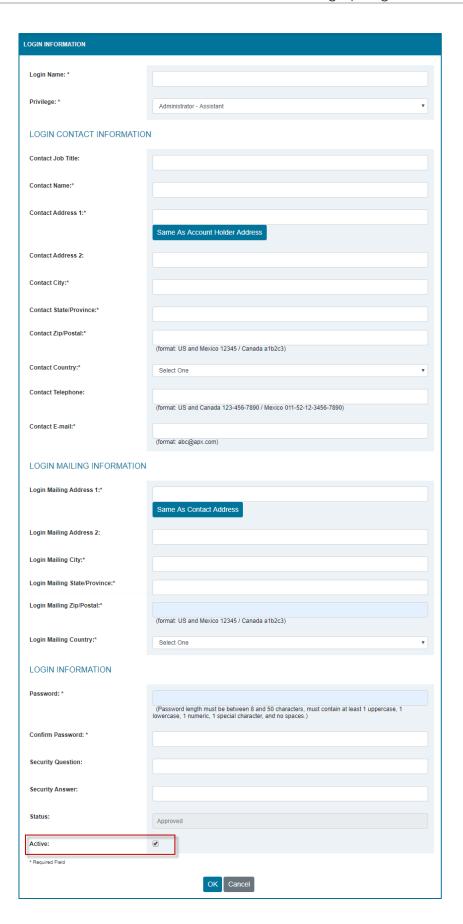
3.1.3 Sub-accounts can be edited by clicking the "Sub-Account Name" within the Open Account section of the Account Status module. Sub-account name and statuses are managed within the screen. Sub-accounts cannot be closed when there are credits in the account. Required fields are marked with an asterisk.

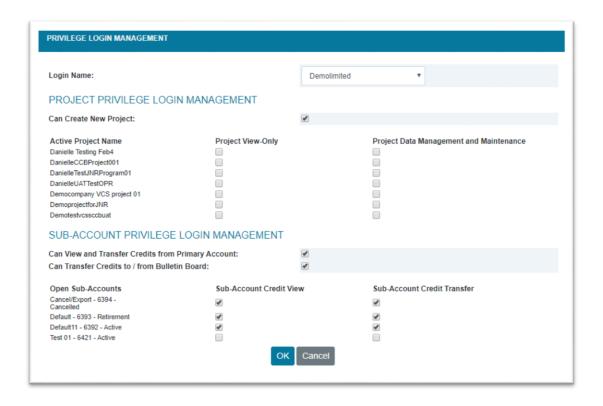


## 3.2 Managing Logins and Privileges

3.2.1 Additional logins can be created by the Account Manager through the Review/Edit/Add Logins screen in the Account Management module. Select the privilege for the login and complete the login form. Limited Access logins require the project and sub-account privileges to be defined. The login must be enabled as "active" to support registry access.







# 4 INVOICING AND BALANCE MANAGEMENT

#### 4.1 My Invoices

4.1.1 Account and project invoices can be viewed using the "My Invoices" screen which is located in the Account Holder Reports Module. In the My Invoices screen, invoice information can be extracted, and Available Balances, Pending Balances, and Overdue Balances can be viewed.



4.1.2 Invoice distribution by email is managed by enabling or disabling the checkbox "Send PDF with invoice notification". Invoices can be downloaded from the My Invoices screen in PDF, Excel and CSV formats.

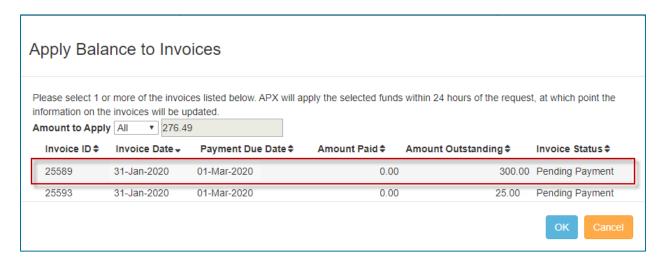


### 4.2 Management of Available Balances

4.2.1 An account may have a credit balance that can be used for invoice payments. The credit balance appears as an "Available Balance" in the My Invoice screen. Click the "Apply balance to invoice" link, to open the Apply Balance window.



4.2.2 In the Apply Balance window, invoices with outstanding balances are presented. When selecting an invoice and clicking "OK", the available balance can by fully or partially applied to the selected invoice. Note, applied balances require 24 hours to process during standard registry support hours; this excludes US weekends and holidays.



# 5 PROJECT CREATION AND PROCESSING

#### 5.1 Introduction

This section will cover how to create a project in the Verra Registry, as well as how to progress the status of a project. To find rules and requirements, as well as templates for each individual project type, please see the below links:

- Verified Carbon Standard (VCS)
- Climate, Community & Biodiversity Standards (CCB)
- Sustainable Development Verified Impact Standard (SD VISta)
- Verra Offset Project Registry (OPR)

#### 5.2 Registering a New Project

Account types of General Account and Project Proponent are eligible to register projects in the registry. New projects are registered in the Project Management module by clicking the respective project type link, which opens the project registration form. Required fields for project creation are represented with an asterisk.



Once you have clicked your respective project type you will see the below form:

Project Proponent: *	I am the Proponent Single Multiple	
Project Proponent Name: *	Select Project Proponent	,
Project Name: *		
Project Description: *		

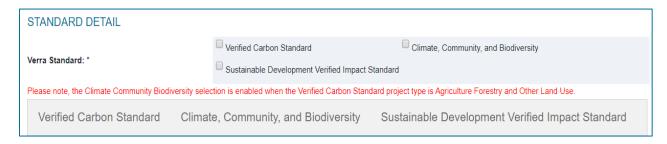
You will have three options to pick from for the Project Proponent:

- I am the Proponent Use this option if you are the Project Proponent and the Account Manager.
- Single Use this option if you are the Account Manager but using an independent Project
  Proponent (note: this will activate the "Project Proponent Name" drop down which provides
  you all of the eligible project proponents in the Verra Registry. If your Project Proponent
  does not already hold an account, they will need to create an account to be added to this
  database.
- Multiple Use this option if there are multiple project proponents.

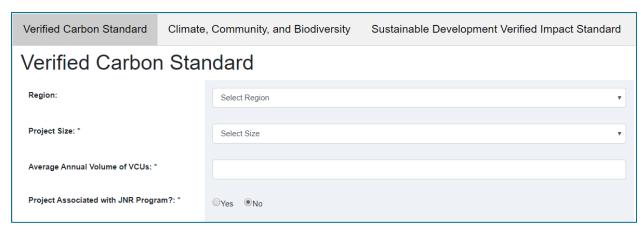
Enter in all relevant information, at minimum completing the fields marked with asterisks.

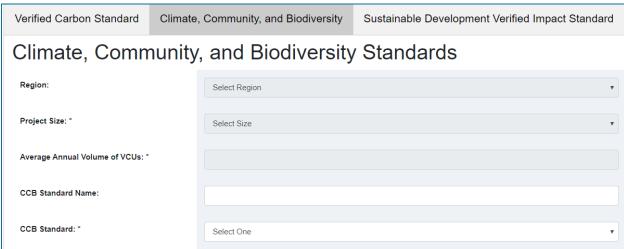
Note that double asterisks appear by the KML file requirement in the project location section. This is only required for certain project types. An option to upload the KML file will appear at the bottom of the project record if required. All information entered into the project record must be consistent with the documentation you intend to submit.

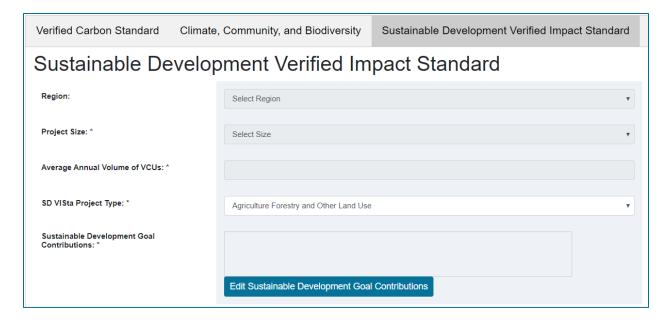
Once you reach "Standard Detail", you will be asked to select the Standard type your project is associated with, as seen below.



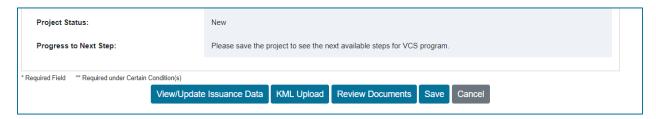
You may select multiple standards. For each standard selected you will need to complete the associated fields as seen below.







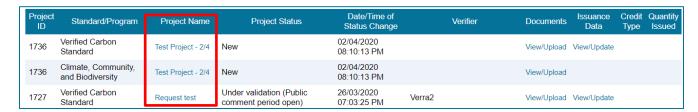
You will not be able to submit your project for initial review until you have completed all the required fields associated with each standard type that you have selected. Once you have completed the required fields you will see the below section.



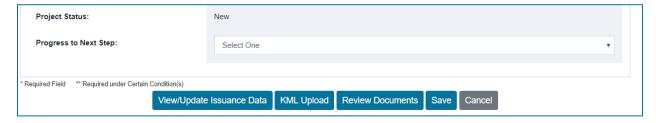
Click save for each Verra Standard section you have completed as an applicable standard. Though related, you will need to save progress under each standard separately.

#### 5.3 Progressing an active project

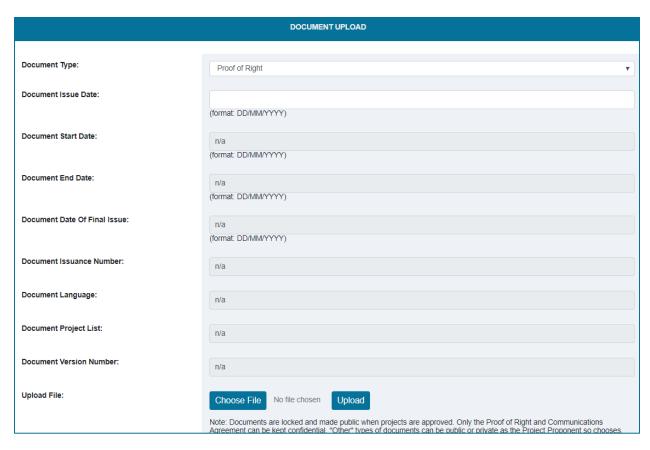
To progress an active project to the next step you will need to locate the project in the Project Management module. Click the desired project name and scroll to the bottom of the record.



Once you have located your project, click on the project's name to access the record and scroll to the bottom. At the bottom you will see the below.



To progress a project to a particular status, you will need to first ensure all documentation required for that status has been uploaded in the Review Document tab. To upload documents, click Review Documents and scroll down to Document Upload, select the Document type, Document Issue date and then click Choose file to locate the document on your computer. Once located, click "Upload" and the document will automatically save to your project record as seen below.



Once documents have been uploaded, click "Go to Project Registration" to return to the project record. Scroll back to the bottom of the project record and simply click the down arrow on "Progress to Next Step" and select the status you wish to progress to. This will trigger a notification for the Verra Registry team to review the project and hand the information over to the Program Team for further review.

Please note that if you are trying to progress a project that is participating under multiple standards at the same time, you will need to go into each standard section and make the necessary status updates for each. An example of this can be seen in the Project Management image above, whereby two separate entries with the same project ID and project name are shown, but under different standards.



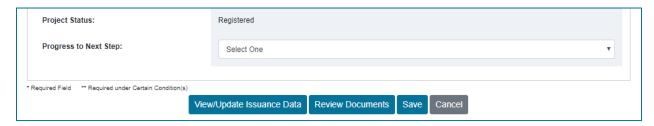
## 6 ISSUANCE

#### 6.1 Requesting issuance

To request issuance, you must first find the project you would like to issue from in the Project Management module. Note that the project status must be of a status that is qualified for issuance. Proceed to click "View/update" in the Issuance Data column.



You may also click the Project Name and scroll to the bottom of the project record then click "View/Update Issuance Data".



If this is the first time issuing for a particular verification period, you will first need to create an emission record.



Otherwise, you will need to locate the emission record that you want to issue from in the Emission and Vintage records module.

If entering a new emission record, you will need to complete all required fields as noted by asterisks. The information for the emission record will be located in the project's verification report. Once you have completed all sections and confirmed the information is accurate, click Save. This will notify the Verra Registry Administrators to review the issuance record to verify the information entered is correct. You may at this time find your emission record in the emission and vintage

record module and add an issuance request by clicking "Add Issuance" next to the emission record you would like to issue from, as seen below.



Enter in all required information as noted by the asterisks. Note that "Quantity of Credits to be Deposited in Buffer Account" will only appear for AFOLU projects, and you are required to submit all the required buffer credits at the time of the first issuance of the project. Once the information is entered, click Save. This will notify the Verra Registry Administrator to review the request. Should the review be successful, the Registry Administrator will inform you that an invoice has been generated and will need to be paid before the credits are issued to your account.

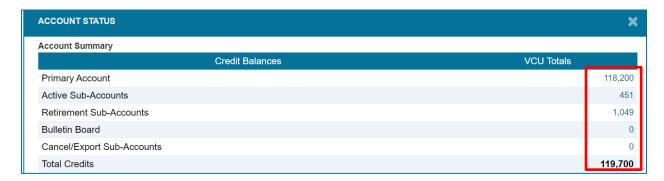
To access your invoices, return to your accounts home page and select "My Invoices" in the account holders reports then select the Invoice ID associated with your issuance request. A PDF will be created with instructions on how to pay the issuance fee. Once payment is received, the registry administrator will proceed with issuing your credits and you will be notified when the credits have been issued to your account.



# 7 CREDIT TRANSFER

## 7.1 Transferring Credits

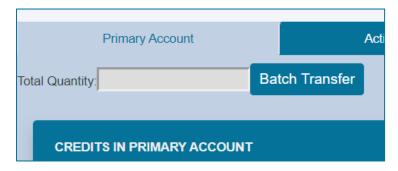
To conduct a credit transfer, log into the registry and select the account from which you would like to transfer credits. Select the VCU Totals in the account you would like to transfer credits from in the Account Status module.



Enter the amount that you would like to transfer in the transfer quantity section and then select "Add batch".



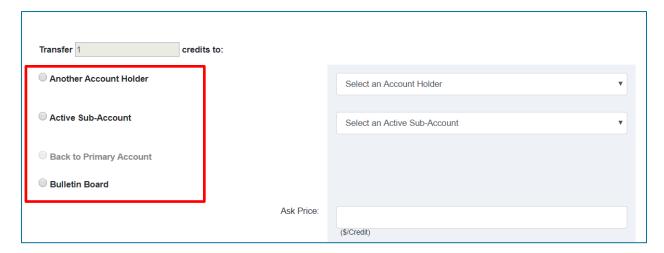
Navigate to the upper left-hand corner of the registry, verify the amount you would like to transfer and then select "Batch Transfer".



Fill out the transfer credit page. Select the account type you would like to transfer to. Your options are as follows:

- Another Account Holder This would be to transfer credits to another account holder. You must use the "Select an Account Holder" drop down and locate the Account Holder you want to transfer to. You will need to know the other accountholder's account ID.
- Active Sub-Account This would be to transfer to one of your own Sub-Accounts and you
  will need to use the "Select an Active Sub-Account" drop down to locate the Sub-Account
  you wish to transfer to.
- Back to Primary Account This would be used to transfer credits from a Sub-Account back to the primary Account. This can only be accessed through a Sub-Account.
- Bulletin Board This would post the credits to the public Bulletin Board allowing individuals to contact you in regard to the credits.
- Retirement Sub-Account Instructions for the Retirement Sub-Account can be found in the Retirement Sub-Account section below.

You will need to select the radio button next to the account you wish to transfer to and complete the aformentioned fields. Once completed, click Submit to process the credit transfer.



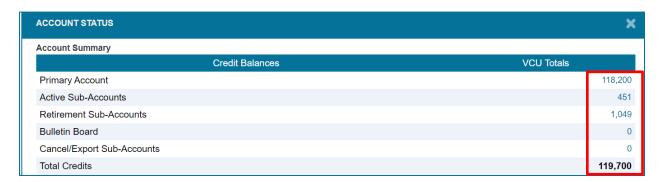
After submission, you can verify that the transfer has completed by looking at your Credit Transfer History in Account Holder reports.



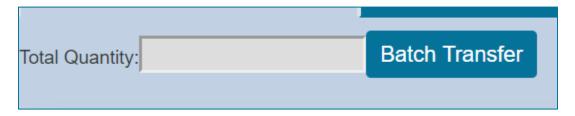
# 8 RETIREMENTS

### 8.1 Retiring credits

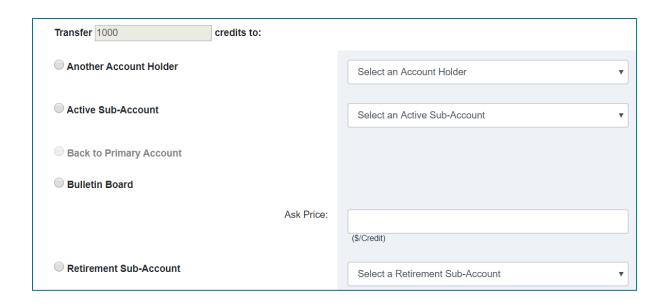
To retire credits, select the VCU Totals in the account you would like to retire credits from in the Account Status module.



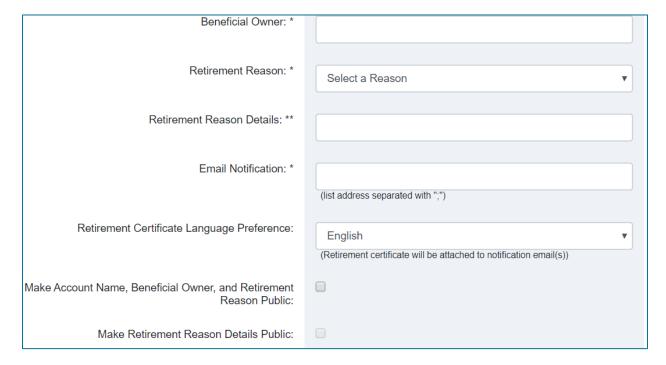
Enter the quantity you would like to retire in the transfer quantity tab and then select Add Batch. Once selected, click Batch Transfer at the top.



On the next screen, "Transfer Credits", select the Retirement Sub-Account option and complete all required fields as indicated by asterisks. One you have selected the Retirement Sub-Account radio button, select the adjacent Retirement Sub-Account you would like the credits to be stored.



The Beneficial Owner is the entity you are retiring the credits for. There can be multiple emails applied to the email notification by separating each individual email with a semicolon. Finally, there are two options regarding information you may make public if any. Check the boxes of information you want public and then hit submit.



## 9 PUBLIC RECORDS

## 9.1 Public record options

Public records can be found on the Verra Registry login portal. Scroll down from the login module and click on the standard you wish to run reports on.



#### Verified Carbon Standard

The VCS Program allows certified projects to turn their greenhouse gas (GHG) emission reductions and removals into tradable carbon credits. Since its launch in 2006, the VCS Program has grown into the world's largest voluntary GHG program. VCS projects include dozens of technologies and measures which result in GHG emission reductions and removals, including renewable energy, forest and welfand conservation and restoration, transport efficiency improvements, and many others.



#### Climate, Community & Biodiversity Standards

The CCB Program is the leading framework for assessing land management projects that create net positive benefits for climate change mitigation, for focal communities and for biodiversity. The standards can be applied to all types of land management projects, including forest conservation and restoration, agroforestry, sustainable agriculture, and others. The CCB Program can be used in conjunction with a GHG crediting program, such as the VCB Program, and carbon credits can be labeled with the co-benefits certified under the CCB Program.



#### Sustainable Development Verified Impact Standard

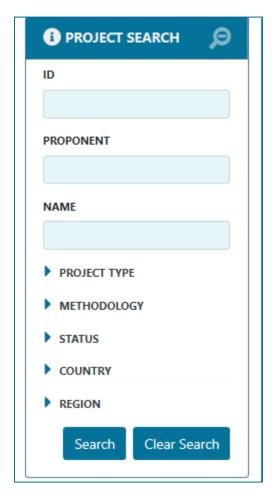
The SD VISta Program is a flexible framework that sets out rules and criteria for the design, implementation and assessment of projects that aim to deliver high-impact sustainable development benefits. SD VISta also allows projects to link their social and environmental impacts to the United Nations Sustainable Development Goals (SDGs). SD VISta enables donors and investors to identify support and help drive finance to activities that generate measurable sustainable development outcomes.



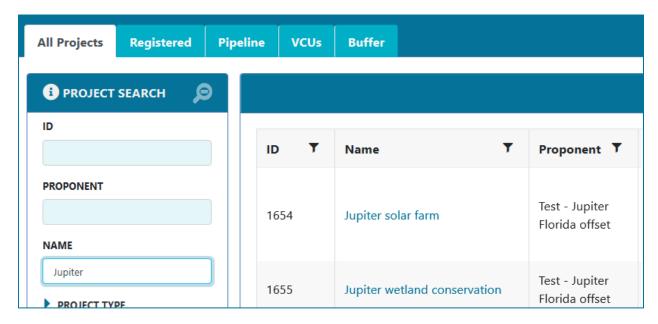
## California Offset Project Registry

The Verra California OPR helps the California Air and Resources Board administer the Compliance Offset Program component of its cap-and-trade system. The OPR facilitates the listing and verification of GHG reduction projects that were developed using ARB Offset Protocols and that issue Registry Offset Credits (ROCs). Entities covered by California's cap-and-trade program can use compliance offset credits to satisfy a portion of their regulatory obligations.

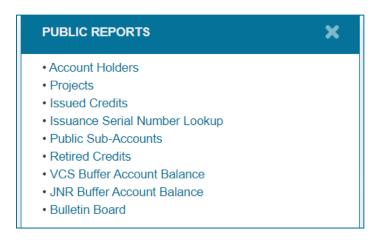
Once you click on the standard, you can apply filters in the Project Search module.



You can select a hyperlinked project name to view public project information including project documents and the public comment period for the project, if available.



You can also view registry specific public reports within your registry account in "Public Reports".





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# 1 Introduction

The Verified Carbon Standard Association (VCSA) maintains accurate, complete and timely financial information enabling VCSA to comply with rules and regulations, meet grant reporting requirements as well as adhere to generally accepted accounting principles. The policies and procedures contained in this manual are aimed to provide VCSA with the tools necessary to effectively manage its financial resources. VCSA operates on a calendar based fiscal year and follows an accrual based accounting system.

# 2 | General Responsibilities

VSCA will conduct all activities morally, ethically, and in the spirit of public accountability and transparency. VCSA will comply with all applicable laws, regulations and common practices for responsible corporations and non-government organizations:

- 1) No funds or assets will be used for any unlawful or improper purpose.
- 2) No contributions will be made for political purposes from VCSA funds in the United States or in any country.
- 3) No payments, gratuities, or gifts will be made directly or indirectly, to any official, employee or other Government or Government agency.
- 4) Financial data required to be submitted to donors, including governments, must be accurate, complete and current. The financial data will be prepared with applicable grant requirements where appropriate.
- 5) No payments will be solicited or received by an employee or relative of an employee from a vendor or sub-grantee or prospective vendor or sub-grantee.

# 3 | Accounting Policies

- Basis of Accounting VCSA's financial statements are presented on the accrual basis of
  accounting. As such, all transaction dates recorded in the accounting system reflect the dates
  the transactions occurred. Revenues are recognized when earned and expenses are recorded
  when incurred. The financial statements are prepared in accordance with Generally Accepted
  Accounting Principles (GAAP), Financial Accounting Standards Board (FASB) Statements of
  Financial Accounting Concepts, and comply with all statutory and regulatory requirements.
- Use of Estimates The preparation of financial statements in conformity with accounting
  principles generally accepted in the United States of America requires management to make
  estimates and assumptions that affect certain reported amounts and disclosures. Accordingly,
  actual results could differ from those estimates.
- Property and Equipment and Related Depreciation Property and equipment are stated at cost and are depreciated using the straight-line method over three to seven years, with no salvage value. Asset acquisitions with a useful life expectancy of greater than one year and with a minimum threshold amount as specified as \$500 are capitalized by the company and depreciated. Upon the retirement or disposal of assets, the cost and accumulated depreciation are eliminated from the respective accounts and the resulting gain or loss, if any, is included in revenue or expenses.
- Revenue Recognition Levy income is recognized as revenue in the month the invoices are submitted to VCSA registries.
- Chart of Accounts To facilitate the record keeping process for accounting, all ledger accounts
  are assigned a descriptive account title and account number, also known as a Chart of
  Accounts. The Chart of Accounts provides the organization a method for assignment and
  maintenance of the organization's ledger accounts, in order to produce meaningful financial
  data.
- Net Assets Unrestricted net assets represent the portion of expendable funds that are available for support of VCSA's operations.

## 4 Accounts Receivable

### 4.1 INVOICES

1) The Senior Accountant creates all invoices using a customized QuickBooks template.

- 2) Invoices for methodology developers, validation/verification bodies, and expert applications are prepared at the request of the program team.
- 3) Registry invoices for VCU levies follow the procedure outlined in section 4.2.
- 4) The Senior Accountant follows up on all unpaid invoices on a monthly basis.

### 4.2 REGISTRY INVOICING

The VCSA registries, APX and Markit, collect levies on issued VCUs on behalf of the VCSA. Each month the VCSA invoices the registries to collect the levies at the rate specified in the agreement.

- 1) At the beginning of each month, the registries submit a report to the Senior Accountant detailing how many VCUs were issued and the amount due to VCSA for the previous month's VCU levies.
- 2) The Senior Accountant independently verifies the registries' calculations:
  - The Senior Accountant generates a report from the VCS Database, including all VCUs issued during the previous month. The report is sorted by registry.
  - The Senior Accountant verifies that the number of issued VCUs on the database report match the number on the registry's report.
  - The Senior Accountant verifies each registry's calculation of the payable levy on each VCU block.
- 3) If the Senior Accountant's report and the registry's spreadsheet agree, the Senior Accountant will prepare an invoice in QuickBooks. If the Senior Accountant's report and the registry's spreadsheet do not agree, the Senior Accountant will locate the problem and work with VCSA staff or the registry contact to reconcile the difference.
- 4) The Senior Accountant will e-mail the invoices and all supporting documentation (the registries' reports, VCS database report, invoices, and any explanatory materials) to the VCS Chief Operating and Financial Officer for approval.
- 5) Upon approval by the Chief Operating and Financial, the Senior Accountant will e-mail the invoices to the appropriate registry contact.

### 4.3 CHECKS

- 1) The Office Manager receives all checks.
- 2) The Senior Accountant prepares checks for deposit. This includes separating checks from stub, endorsing the checks, and preparing deposit slip.
- 3) The Director of Finance takes deposit to the bank.

- 4) The Senior Accountant attaches deposit slip and check back up (copy or check stub) to customer invoice.
- 5) The Senior Accountant enters invoice payment and deposit into QuickBooks. The Director of Finance then files the invoice and appropriate documentation in the accounts receivable files.

### 4.4 ELECTRONIC RECEIVABLES

- 1) The Senior Accountant receives all electronic payment confirmation slips via postal mail.
- 2) The Senior Accountant attaches the electronic payment confirmation to the customer invoice.
- 3) The Senior Accountant enters the invoice payment and deposit into QuickBooks. The Senior Accountant then files the customer invoice and appropriate documentation in the accounts receivable files.

# 5 | Accounts Payable

### 5.1 BILLS

- The Officer Manager via postal mail and electronic mail receives bills. The appropriate program team member must approve program invoices while the Senior Accountant or Office Administrator approve overhead invoices (phone, rent, etc.).
- The Senior Accountant enters bills into QuickBooks for payment.
- Check/electronic payment requests, along with appropriate back up, are submitted to the Senior Accountant via email.
- 4) The Senior Accountant determines which invoices should be paid via wire transfer, ACH transfer, and physical check. The Senior Accountant creates beneficiaries as needed in the online banking system.
- 5) The Senior Accountant and Chief Operating and Financial Officer meet weekly to make transfers and payments, including ACH transfers, wire transfers, and physical checks. Prior to the meeting, the Senior Accountant gathers invoices to be paid and enters ACH or wire transfers as appropriate.
- 6) The Chief Operating and Financial Officer initials all bills and payment requests before payments are made. The Chief Operating and Financial Officer signs physical checks and logs into the online banking system to make wire and ACH transfers. The confirmation is printed for electronic payments. All transfers and payments are made by the Chief Operating and Financial Officer.

7) The Senior Accountant prepares physical checks for mail, attaches electronic confirmation to bills, and files payments in appropriate accounts payable files.

# 6 | Payroll

Payroll is automatically processed on the 15<sup>th</sup> and 30<sup>th</sup> of each month (or the earlier business day in the case of a holiday or weekend). Payroll is processed through ADP, who is responsible for deducting necessary taxes, contributions, garnishments, etc. The Office Manager is responsible for ensuring that wage information, W-4 forms, deductions, etc are up to date in the payroll company's system. The Office Manager updates employee salaries as directed by the CEO.

- The payroll company processes payroll (including necessary taxes and/or garnishments) and deducts full payroll amount from HSBC Free Business Checking. ADP sends the Office Manager the checks/stubs and payroll reports.
- 2) Upon receiving the reports, the Office Manager reviews them for accuracy and delivers the reports to the CEO for review. The accountant accesses payroll reports via online portal and enters the data into QuickBooks as a journal entry.
- 3) The Office Manager distributes checks/stubs to appropriate individuals.
- 4) Timesheets are collected from all employees at the end of each month.
- 5) The accountant reconciles monthly payroll summaries with cash draw-downs and prepares monthly payroll entries.
- 6) The accountant reconciles payroll General Ledger with Federal Form 941/940 on a quarterly basis to verify General Ledger reconciles with payroll tax filings.
- 7) The accountant reconciles all payroll related General Ledger accounts to ensure accuracy and correct W-2 Forms are produced by ADP.

## 7 | End of Month Procedures

- 1) At the end of the month, the Senior Accountant receives and reconciles the statements for the HSBC MasterCard credit card. The Senior Accountant then enters the charges into QuickBooks.
- 2) The Office Manager receives HSBC bank statements and gives them to the Director of Finance to review. The Senior Accountant reconciles VCSA's business direct, free business checking, and savings statements.
- 3) After review and the appropriate entries have been made, the Senior Accountant submits bank statements to the Director of Finance to complete the monthly bank reconciliations.

- 4) Monthly bank reconciliations are prepared to ensure that the checking accounts match the balances recorded in the banks' records and agree to activity recorded in the general ledger. Bank reconciliations are prepared for each bank account, including operating and saving accounts. The Director of Finance who does not have access to release any ACH or wire payments performs the reconciliation.
- 5) The Director of Finance reviews the statement and notifies the Chief Operating and Financial Officer of any irregularities. The Director of Finance produces monthly profit and loss statement and monthly budget comparison for review by the Chief Operating and Financial Officer and department heads.
- 6) Before closing the month and preparing the monthly statements, the Senior Accountant ensures that all invoices/bills with revenues/expenses incurred in that month have been entered. All bills received after the monthly closing but dated in that month will be given the date of the first day of the following month.

# 8 | Quarterly Procedures

The fixed asset schedule is maintained and depreciation expense is calculated quarterly by the accountant and the required adjusting entry is posted in QuickBooks. The Senior Accountant then reviews the schedule.

Payroll is reconciled with Form 941/940 tax forms and manual re-performance schedule to ensure the integrity of payroll.

Accounts receivable and Accounts payable aging is reviewed on a quarterly basis to ensure all outstanding receivables are collected and all the bills are paid on time.

## 9 | End of Year Procedures

- The Director of Finance reviews expense General Ledger accounts to ensure that all payments are properly allocated to the correct account.
- 2) The Senior Accountant works with Director of Finance and Verra staff to ensure that all income and expenses are recorded in the year in which they were incurred. The Senior Accountant coordinates with the Director of Finance who prepares the year-end adjustments.
- 3) The Senior Accountant coordinates with Director of Finance to ensure that the organization has issued the required 1099 forms for all independent vendors and consultants. The accountant will also produce Form 1096 and a copy of Form 1099 for Internal Revenue Service.

4) The Senior Accountant coordinates with Accountant and Auditors to begin financial audit and prepare IRS Form 990.

# 10 Internet Banking

Verra maintains an online banking portal with HSBC.

- 1) The CEO and Chief Operating and Financial Officer maintain authorized access to the HSBC checking, savings, and credit card accounts.
- 2) The CEO and Chief Operating and Financial Officer are authorized to release payments and transfer funds between accounts.
- 3) The Director of Finance is authorized to access the reports for the checking and credit card accounts.
- 4) The Senior Accountant will not enter payments or transfer funds without the approval of the Chief Operating and Financial Officer.

## 11 Records Retention

VCSA will maintain the following records for the period of time specified in each category.

- 1) Permanently
  - Accountants' audit reports
  - Depreciation schedules
  - Year-end Financial statements
  - General ledgers
  - Insurance records
  - Legal and other important correspondence
  - Board Meeting Minutes
  - Trademark registrations
  - Copies of Employee Manuals
- 2) Retain for seven years
  - Expense reports (including personal)

- Accounts payable ledgers and schedules
- Accounts receivable ledgers and schedules
- Expense analysis and distribution reports
- Expired Contracts
- Garnishments
- Vendor Invoices
- Payroll records and summaries
- Personnel records of discharged employees
- Timesheets/cards/books
- Vouchers for payment to vendors and employees
- Withholding tax statements, returns, and worksheets
- 3) Retain for three years
  - Bank statements & reconciliations
  - Employment applications
  - Insurance policies (expired)
  - Invoices to customers
  - Petty cash vouchers
- 4) Retain for two years
  - General correspondence, routine correspondence with clients, members and vendors
  - Duplicate deposit slips

## 12 Foreign Corrupt Practices Act (FCPA)

The Foreign Corrupt Practices Act (FCPA) of 1977 states that it is illegal to make payments to foreign government officials to assist in obtaining or retaining programing activities. The first section makes it illegal to bribe foreign officials, and the second section imposes record keeping and internal accounting requirements. Those individuals working in foreign countries should understand the laws pertaining to the countries they are working in. Employees should also be aware of the risks posed by paying any fees or making gifts to foreign parties, whether they are government employees or not.

These are few of items needs to be noted:

- The accounting staff must have a sufficient understanding of what is and is not acceptable on an accounting level with the FCPA. They must also know how to review, evaluate, audit, and control transactions to ensure that VCSA is FCPA compliant. This includes:
  - Keep accurate detail of all payments and expenses related foreign transactions.
  - All payments to foreign officials must be recorded as such no undisclosed or unrecorded accounts are to be established for any purpose
  - False or artificial entries are not to be made in the books for any reason
  - Adequate monitoring systems should be in place to detect violations of Conti Accounting policy and applicable laws
- All purchasing and contracting activities, including those involving third-parties, require due diligence from operations program personnel to ensure VCSA is complying with both the FCPA and all local Corruption Laws.



## Verra Registry V2 Release Notes

## October 2020

## Background

Verra is pleased to announce Version 2 (V2) of the Verra Registry, released on Thursday, 15 October. Updates to this version include added functionality, improved reporting and resolving several bugs in V1. We hope that these improvements will enhance your user experience on the registry. Please do not hesitate to contact <a href="registry@verra.org">registry@verra.org</a> with any questions about these updates.

## **Updates and Improvements**

### CORSIA Label Added

Project proponents can now request that their issued credits receive a CORSIA label where specific requirements are met. The new label is "CORSIA1" which reflects the first CORSIA phase. The process to request the "CORSIA1" label is the same as for other labels. Requests will be subject to review by the Registry Administrator to ensure that the ICAO criteria for CORSIA eligibility are met (click <a href="here">here</a> for more information). Please notify the Registry Administrator at registry@verra.org when you submit a CORSIA label request for approval, providing the following information: Project name, project ID, vintage period.

Please note that Verra is exploring the potential to automate these labels in the future.

## 2. Multiple Improvements to the Verra Registry Public Home page and Search Screens

A number of improvements were made for users visiting the public portions of the Verra Registry, including the following:

- (a) The login window has been moved to the top menu for quicker access.
- (b) The home page has been redesigned so users can locate public reports more easily either by going through the top menu or through the standard/program summaries.
- (c) The ability to search between date ranges has been added.
- (d) "Bread crumbs" have been implemented on the public registry screens to allow users to navigate the respective pages more easily.
- (e) "Additional Certifications" have been added to all screens where VCUs are displayed.



## 3. Retirement Records on Public Registry Implemented

The retirement records on the public registry now provide the following additional information:

- (a) Serial number
- (b) Retirement reason\*
- (c) Retirement reason details\*
- (d) Beneficial owner\*

## 4. Additional Certification data implemented

Information on additional certifications of VCUs (e.g., SD VISta, CCB) is now available on all registry screens including the following:

- (a) Issued Credits;
- (b) Serial Number Look Up;
- (c) Retired Credits;
- (d) Bulletin Board;
- (e) My Accounts, Quantity of Credits;
- (f) My Credits, Quantity;
- (g) Inbox, Quantity of Credits;
- (h) Outbox, Quantity of Credits; and
- (i) Credit Information Report.

## 5. Jurisdictional and Nested REDD+ (JNR) Data Now Available

The work flow to support the submission and management of JNR programs has been implemented. Public data on JNR programs and projects now available through the public registry under VCS.

## 6. Multiple Bugs Resolved

<sup>\*</sup>These are optional fields and do not display publicly, if the account holder chooses to keep them private.

## **ATTACHMENT A: PROGRAMME REGISTRY ATTESTATION DISCLOSURE FORM**

#### PART 1: INSTRUCTIONS FOR REGISTRY REPRESENTATIVE

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### PART 2: PROGRAMME AND REGISTRY REPRESENTATIVE INFORMATION

### 1. Programme Representative Information

### A. Programme Information

Programme name: VCS

Administering Organization<sup>1</sup>: Verra

Official mailing address: registry@verra.org

Telephone #: N/A

Official web address: https://registry.verra.org/

## B. Programme Administrator Information (i.e., individual contact person)

Full name and title: Naomi Swickard, Chief Program Officer

Employer / Company (if not programme): Verra

E-mail address: nswickard@verra.org Telephone #: N/A

### C. Programme Representative Information (if different from Programme Administrator)

Full name and title: Click or tap here to enter text.

Employer / Company (if not Programme):

E-mail address: Telephone #: Click or tap here to enter text.

## 2. Registry Representative Information<sup>2</sup>

## A. Registry Information

<sup>1</sup> **Please complete**, even if the name of the business, government agency, organization, or other entity that administers the Emissions Unit Programme is the same as "*Programme Name*".

<sup>&</sup>lt;sup>2</sup> Please complete this section, even if the business, government agency, organization, or other entity that administers the Emissions Unit Programme Registry is the same as the organization described in Part 2. "1. Programme Representative Information".

Registry / system name: Verra Registry

Administering Organization: Verra

Official mailing address: registry@verra.org

Telephone #: N/A

Official web address: https://registry.verra.org/

## B. Registry Administrator Information (i.e., individual contact person)

Full name and title: Naomi Swickard

Employer / Company (if not Registry Administering Organization): Verra

E-mail address: nswickard@verra.org Telephone #: N/A

## C. Programme Representative Information (if different from Registry Administrator)

Full name and title: Click or tap here to enter text.

Employer / Company (if not Registry Administering Organization): Click or tap here to enter text.

E-mail address: Click or tap here to enter text.

Telephone #: Click or tap here to enter text.

### PART 3: EVIDENCE OF ADHERENCE TO SCOPE OF REGISTRY RESPONSIBILITIES

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